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5 Attorney for Defendant
6 Glenn Swift

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

(HONORABLE BARBARA L. MAJOR, JUDGE)

11 UNITED STATES OF AMERICA,) Criminal Case No.08MJ1161
12 Plaintiff,)
13 v.)
14 GLENN SWIFT,)
15 Defendant.)
JOINT MOTION: MODIFICATION
OF PRETRIAL TRAVEL RESTRICTIONS

17 IT IS HEREBY STIPULATED and agreed, by and between the defendant, GLENN
18 SWIFT, by and through his attorney, Jan Edward Ronis, and the plaintiff, UNITED STATES
19 OF AMERICA, through its counsel, Karen P. Hewitt, United States Attorney, and STEWART
20 YOUNG, Assistant United States Attorney, that defendant GLENN SWIFT's pretrial travel
21 restrictions be modified expand his travel restriction to the Central District of California.
22 The defendant would like to be allowed to travel to and from the Central District because he is
a partner of a business called Generation Construction located within the Central District.

23 Pretrial Services Officer Tammy Reidling has been notified of this request and has no
24 opposition. The sureties have no objection. (See attached letter)

1 Joint Motion Re: Modification of Pretrial Travel Restrictions
2 *U.S.A. v SWIFT*, Case No. 08cr1161

3 The parties hereby stipulate and agree to the foregoing:

4 **SO STIPULATED AND AGREED.**

5 Dated: April 24, 2008

S/JAN EDWARD RONIS
JAN EDWARD RONIS
Attorney for Defendant Swift

8 Dated: April 24, 2008

UNITED STATES OF AMERICA

10 S/STEWART YOUNG
11 STEWART YOUNG
Assistant United States Attorney

13 **CERTIFICATE OF SERVICE**

14 Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of his
15 information and belief, and that a copy of the foregoing document has been served this day upon:

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13 April 24, 2008

14 S/JAN EDWARD RONIS

15 JAN EDWARD RONIS

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